

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

D-1 Seandre Lamarr Braxton, and  
D-2 Damario Lashun Howell

Case: 2:21-mj-30474  
Case No. Assigned To : Unassigned  
Assign. Date : 10/4/2021  
Description: CMP USA v. BRAXTON  
ET AL (SO)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 29, 2021 and October 1, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
(D-1 and D-2) 18 U.S.C. § 2119	Carjacking
(D-1 and D-2) 18 U.S.C. § 924(c)	Use of a firearm during and in relation to a crime of violence (carjacking)
(D-1 only) 18 U.S.C. § 922(g)	Felon in possession of a firearm

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: October 4, 2021

City and state: Detroit, Michigan

  
Complainant's signature

Christopher S. Pennisi, Special Agent (FBI)  
Printed name and title

  
Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**  
**AND ARREST WARRANT**

I, Christopher S. Pennisi, being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the Federal Bureau of Investigation for sixteen years, and is currently assigned to the Violent Crime Squad in the Detroit Division of the FBI.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

4. The statements contained in this affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

5. This affidavit is made in support of a criminal complaint charging Seandre Lamarr Braxton and Damario Lashun Howell with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm, in violation of 18 U.S.C. § 2119.

6. This affidavit is also made in support of a criminal complaint charging Braxton and Howell with use of a firearm in relation to a crime of violence (carjacking), in violation of 18 U.S.C. § 924(c).

7. This affidavit is also made in support of a criminal complaint charging Braxton with being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g).

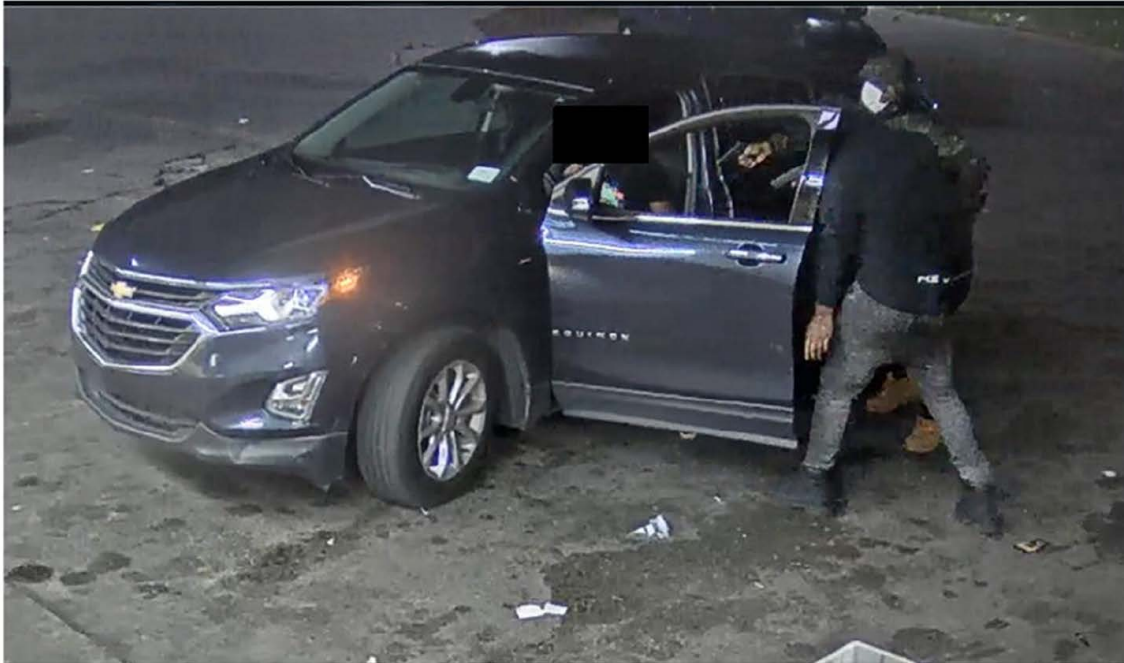
## **II. SUMMARY OF THE INVESTIGATION**

### ***INCIDENT #1***

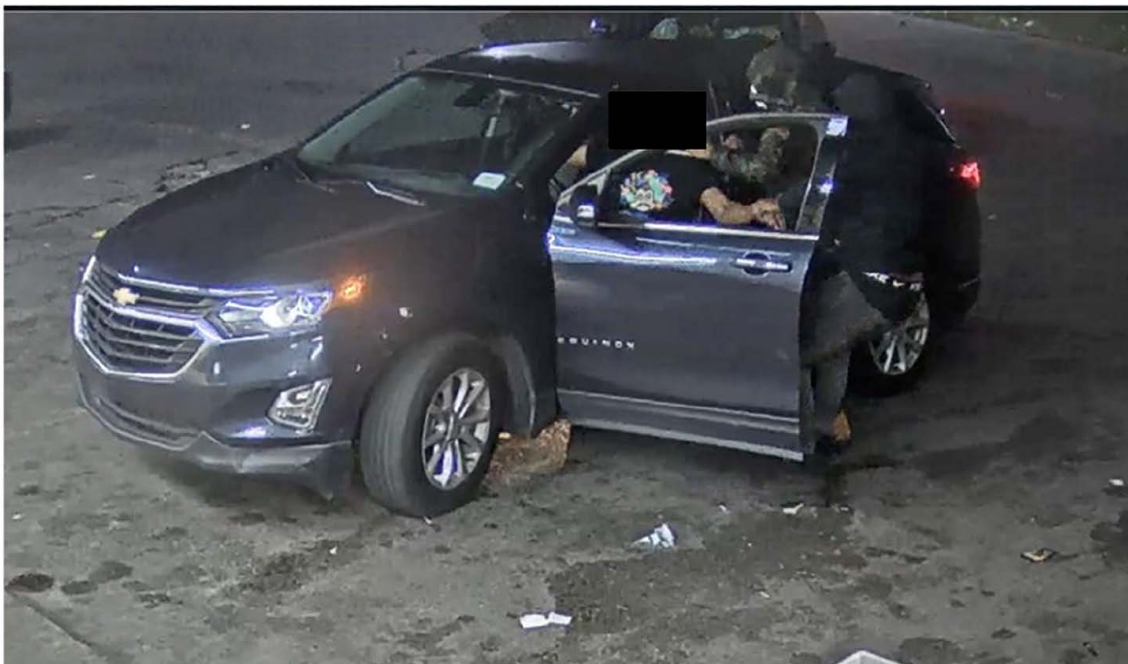
8. On September 29, 2021, adult victim (“AV-1”) parked his 2019 Chevrolet Equinox at a liquor store located at 1\*\*\*\* Harper Avenue, in the City of Detroit, then went to sleep while in the driver’s seat of the car.

9. At approximately 11 pm, two males, later identified as Seandre Braxton and Damario Howell approached AV-1, stated “get the fuck out the car”

and pointed handguns at him as shown in the below image captured from the surveillance video system of 1\*\*\*\* Harper:



10. Braxton and Howell then pulled AV-1 out of the car as depicted below.



11. Howell entered the driver's seat of the car, continued to point a gun at AV-1, then drove off as depicted below.



12. The other male, later identified as Seandre Braxton, walked away from the scene.

### ***INCIDENT #2***

13. On October 1, 2021, adult victim 2 ("AV-2") drove to the Citgo gas station located at 9\*\*\* E. Jefferson Avenue, in the City of Detroit. AV-2 went inside the gas station to prepay for gas then exited and began pumping gas into AV-2's relative's 2019 Dodge Journey that AV-2 was driving at the time.

14. AV-2 went back towards the gas station store but a male, later identified as Seandre Braxton, exited the store, pointed a handgun at AV-2 and said “run your pockets, give me all that shit.” As he did so, a second gunman, later identified as Damario Howell, also drew a handgun and pointed it at AV-2.

15. After AV-2 surrendered his money and other items in his pockets, Braxton told AV-2 “give me your fucking car keys.” Braxton took the keys and then Braxton and Howell split up. One of them drove off in AV-2’s car and the other in a gray Chevrolet Impala with no license plate affixed to it.

### ***INCIDENT #3***

16. On October 1, 2021, at approximately 8:30 pm, adult victim 3 (“AV-3”) and his two cousins were at the Family Dollar located at 1\*\*\*\* McNichols Road in the City of Detroit.

17. After they finished shopping, AV-3’s two cousins entered AV-3’s 2019 Dodge Challenger while AV-3 knelt down to fix the rear license plate, which had lost a screw.

18. AV-3 heard a car come screeching up and someone said “don’t move.” AV-3 then stood up and saw a male, later identified as Seandre Braxton, pointing a pistol at AV-3’s head.

19. Braxton told AV-3 “you know what this is” and demanded AV-3’s gold neck chains and money. AV-3 surrendered his chains but told Braxton that he didn’t have any money. Braxton then asked AV-3 who else he had with him and made AV-3’s cousins exit the Dodge Challenger.

20. AV-3 then noticed that the driver of the car that Braxton arrived in, a gray Dodge Journey, was pointing a gun at AV-3’s cousins over the roof of the car.

21. The driver of the Journey was later identified as Damario Howell.

22. At some point Braxton told Howell to get out of the car and rob the occupants of AV-3’s car.

23. Braxton later asked AV-3 what else he had in his pockets, and AV-3 told him that he didn’t have anything but his car keys. Braxton then demanded the keys and AV-3 gave them to him. Braxton then told AV-3 “I should kill you all mother fuckers for not having nothing.”

24. Braxton then entered AV-3’s car and drove off following Howell driving the Dodge Journey.

### ***CAPTURE OF BRAXTON & HOWELL***

25. Approximately five minutes after the carjacking of AV-3, Detroit Police observed the gray Dodge Journey taken from AV-3 on East Outer Drive. A traffic stop was attempted and a vehicle chase ensued. Ultimately, the driver of the



Journey exited the vehicle at the intersection of Stotter and Savage and was observed by police officers being picked up in AV-3's carjacked car.

26. At approximately 2 am on October 2, 2021, Detroit Police officers observed AV-3's car leaving a gas station on Van Dyke and driving at a high rate of speed.

27. Several Detroit Police vehicles, both marked and unmarked, along with a Michigan State Police helicopter began following the Challenger. A car stop was attempted, but the Challenger continued to flee.

28. Eventually, the Challenger crashed near the intersection of Fairmont and Queen and both occupants, later identified as Seandre Braxton and Damario Howell, fled on foot.





29. Following a short foot chase, both Braxton and Howell were taken into custody, within minutes of the crash several houses away from the crash site.

30. A search of AV-3's car revealed a black Glock model 20 handgun with serial number BSPU540 inside the car. The gun was loaded with fifteen rounds in the magazine and one additional round in the chamber. Further search of the car revealed two additional magazines for the gun, one of which was loaded with two live rounds.

### ***FOLLOW-UP INVESTIGATION***

31. On October 3, 2021, Braxton was placed in a live lineup containing four additional males of similar age, height, weight and hair style. The lineup was viewed by AV-2, who, after a short time, selected Braxton as the person that approached him with a gun drawn on October 1, 2021.

32. Later on October 3, 2021, Howell was placed in a live lineup containing a different set of four additional males of similar age, height, weight and hair style. The lineup was viewed by AV-2, who, after a short time, selected Howell as the second person holding him at gunpoint on October 1, 2021.

33. Both Seandre Braxton and Damario Howell were wearing GPS tethers affixed as a condition of their probation from September 29 – October 1, 2021. Braxton's tether reported his location every minute while Howell's reported his location every five minutes.

34. Review of Braxton's tether report reveals that at 11:42 pm on September 29, 2021, Braxton's tether was located at 1\*\*\*\* Harper, the exact location of AV-1's carjacking. Approximately one minute later, Howell's tether reported its location as 1\*\*\*\* Wayburn Street, which is approximately one half mile away from the location of AV-1's carjacking.

35. Further review revealed that four minutes prior to AV-2's carjacking, 7:37 pm on October 1, 2021, Braxton's tether reported its location as 1\*\*\* Pennsylvania Street, which is approximately 120 feet from 9\*\*\* East Jefferson, the location of AV-2's carjacking. At 7:39 pm, Howell's tether reported its location as 1\*\*\*\* Kercheval Avenue, which is approximately 1000 feet from the location of AV-2's carjacking.

36. At 8:34 pm and 8:35 pm on October 1, Braxton and Howell's tethers respectively reported their locations as 1\*\*\*\* West McNichols, the exact location of AV-3's carjacking.

37. On October 3, 2021, Damario Howell was interviewed. Howell explained that he was taken into custody after having been involved in the crash of the Dodge Challenger.

38. Howell confessed to participating in all three carjackings at the urging of Seandre Braxton. Howell explained that Braxton and he both participated in each carjacking. However, Braxton took the lead during each incident, and kept all of the money and possessions that were taken from the three victims.

39. Howell also confessed to receiving the gun he used from Braxton. Howell was certain that the gun he had was real based on its weight and the appearance and size of the barrel of the firearm.

40. Howell also confessed to brandishing the firearm Braxton gave him in each of the three incidents.

41. Howell explained that Braxton frequently carried the Glock pistol that was recovered from AV-3's car following their arrest.

42. Howell explained that Seandre Braxton drives a gray Chevrolet Impala.

43. Glock handguns are manufactured in the state of Georgia and the country of Austria. Consultation with an interstate nexus expert employed by the Bureau of Alcohol Tobacco and Firearms confirmed that the handgun recovered from AV-3's car travelled in interstate commerce to reach Michigan.

44. Based on the VIN numbers assigned to the cars taken from AV-1, AV-2, and AV-3, they were all manufactured outside the United States. Therefore they were all "transported in interstate commerce" as recited in 18 U.S.C. § 2119.

45. On September 6, 2016, Braxton pled guilty to a violation of Michigan Compiled Law 750.535 § 7, Felony Receiving and Concealing Stolen Property in Michigan's Third Circuit court. Pursuant to MCL 750.535 § 8, a person who violates § 7 is guilty of a "felony punishable by imprisonment for not more than five years."

46. On March 4, 2021, Braxton was charged with possession of a firearm by a felon, which was bound over for trial in Michigan's Third Circuit Court on July 29, 2021.


### **III. CONCLUSION**

47. Based on the above information, probable cause exists that Braxton and Howell took a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm, in violation of 18 U.S.C. § 2119, and used a firearm in relation to a crime of violence (carjacking), in violation of 18 U.S.C. § 924(c).

48. In addition, Braxton, possessed a firearm after having been convicted of a felony, in violation of 18 U.S.C. § 922(g).

49. In consideration of the foregoing, I respectfully request that this Court issue a complaint and arrest warrants against Braxton for violations of 18 U.S.C. §§ 2119, 924(c), and 922(g), and Howell for violations of 18 U.S.C. §§ 2119 and 924(c).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Christopher S. Pennisi", written over a horizontal line.

Christopher S. Pennisi, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Jonathan J.C. Grey", written over a horizontal line.

HON. JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE

Date: October 4, 2021